

**From:** [ORR Jim](#)  
**To:** ["HeldtSheller, Stephanie"](#)  
**Cc:** [ROMERO Mike](#); [DeMaria, Eva](#); [Sheldrake, Sean](#); ["MCCLINCY Matt"](#); [poulsen.mike@deg.state.or.us](mailto:poulsen.mike@deg.state.or.us); [THIESSEN Kenneth](#); [LIVERMAN Alex](#); [Claudia Powers \(ckp@aterwynne.com\)](mailto:ckp@aterwynne.com); [Gretchen.Gee@ch2m.com](mailto:Gretchen.Gee@ch2m.com); [Wray, Mike](#); ["Mike Merchant"](#); [Ken.Shump@CH2M.com](mailto:Ken.Shump@CH2M.com)  
**Subject:** RE: DEQ Response to NWP March 8 2016 Email  
**Date:** Thursday, April 21, 2016 11:55:22 AM

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Stephanie, in response to your email DEQ and EPA wish to offer the following clarifications for your team:

1. The proposed work is intended to support the source control evaluation of the VOC plume;
2. DEQ and EPA will consider results of NWP's groundwater modeling effort and attenuation parameters as weights of evidence for the source control evaluation;
3. If the groundwater modeling is contrary to groundwater sampling analytical results then DEQ and EPA would conclude that the model is not representative of site conditions;
4. The analytical data, from the groundwater sampling will be the primary line of evidence to evaluate risk;
5. A source control decision will depend on the groundwater analytical results compared to screening level values and PRGs.

If additional discussion is needed, please feel free to call me. Thanks Jim Orr

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**From:** HeldtSheller, Stephanie [mailto:SHeldtSheller@nwpipe.com]  
**Sent:** Friday, April 15, 2016 11:01 AM  
**To:** ORR Jim  
**Cc:** ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean; 'MCCLINCY Matt'; POULSEN Mike; THIESSEN Kenneth; LIVERMAN Alex; Claudia Powers (ckp@aterwynne.com); Gretchen.Gee@ch2m.com; Wray, Mike; 'Mike Merchant'; Ken.Shump@CH2M.com  
**Subject:** RE: DEQ Response to NWP March 8 2016 Email

Hello Jim,

We are finishing up the revisions to the Supplemental Groundwater Work Plan, and should have that to DEQ/EPA soon. But based on the email below, it sounds like DEQ is planning to base Source Control Decisions solely on groundwater laboratory analytical results compared to SLVs & PRGs, and is not planning to consider the results of the groundwater modeling effort. If that is the case at this late date, it is not our understanding of what is required, particularly by EPA. As DEQ and EPA are aware, NWP's proposed steps forward include a significant effort to collect additional data on aquifer characteristics and natural attenuation parameters to update and refine the 2005 groundwater modeling. If this line of evidence will not be considered in the Source Control decision-making, collecting the additional information would be a waste of time, money and resources.

Please confirm DEQ/EPA's anticipated consideration of the approach proposed by NWP in obtaining a Source Control decision.

Thanks,  
Steph.

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**Stephanie Heldt-Sheller, CHMM**

Corporate Environmental Manager

**Northwest Pipe Company** | 12005 N. Burgard Rd. | Portland, OR 97203 USA

Direct (503) 382 2324 | Cell (419) 283 1890 | Fax (503) 382 2327

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**From:** ORR Jim [mailto:[orr.jim@deq.state.or.us](mailto:orr.jim@deq.state.or.us)]

**Sent:** Tuesday, March 29, 2016 3:09 PM

**To:** HeldtSheller, Stephanie

**Cc:** ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean; 'MCCLINCY Matt'; POULSEN Mike; THIESSEN Kenneth; LIVERMAN Alex; Claudia Powers ([ckp@aterwynne.com](mailto:ckp@aterwynne.com)); [Gretchen.Gee@ch2m.com](mailto:Gretchen.Gee@ch2m.com); Wray, Mike; 'Mike Merchant'; Ken.Shump@CH2M.com

**Subject:** RE: DEQ Response to NWP March 8 2016 Email

Stephanie,

DEQ will not request additional tasks for the proposed groundwater sampling work plan.

The analytical data, from the proposed groundwater sampling, will be the primary consideration for DEQ and EPA to evaluate risk.

A source control decision will depend on the groundwater analytical results compared to screening level values and PRGs.

Please call me if you have questions.

Thank You

Jim Orr

DEQ Northwest Region

700 NE Multnomah St. Suite 600

Portland, Oregon 97232

503-229-5039

Visit DEQ's website at [State of Oregon: Department of Environmental Quality](#)

DEQ's ECSI Database:

[Oregon DEQ: Land Quality - Environmental Cleanup Site Information \(ECSI\) Database](#)

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**From:** HeldtSheller, Stephanie [mailto:[SHeldtSheller@nwpipe.com](mailto:SHeldtSheller@nwpipe.com)]

**Sent:** Thursday, March 24, 2016 9:44 AM

**To:** ORR Jim

**Cc:** ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean; 'MCCLINCY Matt'; POULSEN Mike; THIESSEN Kenneth; LIVERMAN Alex; Claudia Powers ([ckp@aterwynne.com](mailto:ckp@aterwynne.com)); [Gretchen.Gee@ch2m.com](mailto:Gretchen.Gee@ch2m.com); Wray, Mike; 'Mike Merchant'; [Ken.Shump@CH2M.com](mailto:Ken.Shump@CH2M.com)

**Subject:** RE: DEQ Response to NWP March 8 2016 Email

Jim,

Thanks for your March 21<sup>st</sup> letter regarding DEQ's additional requests. Although NWP is very disappointed with the continued addition of supplemental demands not previously identified as being necessary in our earlier discussions, NWP's team agrees to meet DEQ's additional requests. We will incorporate those changes into our revised Final Supplemental Groundwater Sampling Work Plan. We trust that doing so will result in a Source Control Decision for this site, and that no more additional requests will be made. We anticipate sending the revised Work Plan to DEQ for approval within the next few weeks.

Thanks,

Steph.

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**Stephanie Heldt-Sheller, CHMM**

Corporate Environmental Manager

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**From:** ORR Jim [mailto:[orr.jim@deq.state.or.us](mailto:orr.jim@deq.state.or.us)]

**Sent:** Monday, March 21, 2016 10:08 AM

**To:** HeldtSheller, Stephanie; Wray, Mike; [Ken.Shump@CH2M.com](mailto:Ken.Shump@CH2M.com); [Gretchen.Gee@ch2m.com](mailto:Gretchen.Gee@ch2m.com); Claudia Powers ([ckp@aterwynne.com](mailto:ckp@aterwynne.com)); 'MCCLINCY Matt'; POULSEN Mike; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean

**Subject:** DEQ Response to NWP March 8 2016 Email

Stephanie, attached is a response to your March 8<sup>th</sup> email. Please contact me if you have questions.

I will be out of the office from March 22<sup>nd</sup> to March 28<sup>th</sup>.

Thank You

Jim Orr

DEQ Northwest Region

700 NE Multnomah St. Suite 600

Portland, Oregon 97232

503-229-5039

Visit DEQ's website at [State of Oregon: Department of Environmental Quality](#)

DEQ's ECSI Database:

[Oregon DEQ: Land Quality - Environmental Cleanup Site Information \(ECSI\) Database](#)

One Day I Hope to Be the Person My Dog Thinks I Am...